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10 Attorneys for Plaintiffs
11 DENIZ BOLBOL, JOSEPH CUVIELLO
12 and ALFREDO KUBA

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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17 DENIZ BOLBOL, an individual; JOSEPH
18 CUVIELLO, an individual; and ALFREDO
19 KUBA, an individual,

20 Plaintiffs,

21 v.
22 THE CITY OF SAN JOSE, AND HP
23 PAVILION MANAGEMENT,

24 Defendants.

25 Case No. C 04-0082 JW

26 STIPULATION AND [PROPOSED]
27 ORDER EXTENDING TIME FOR
28 FILING OF MOTION FOR
ATTORNEY'S FEES

Hearing Date: TBD
Time: 9:00 a.m.
Courtroom: 8, 4th Floor
The Hon. James Ware

29 WHEREAS, on August 30, 2006, the Court issued an Order Regarding Pretrial Motions
30 and also issued a Judgment and Permanent Injunction (collectively, "Orders and Judgment");

31 WHEREAS, the Orders and Judgment provide that Plaintiffs may recover reasonable
32 attorneys fees incurred in this matter;

33 WHEREAS, Civil Local Rule 54-6 requires that the parties meet and confer for the
34 purpose of resolving all disputed issues relating to attorney's fees before making a motion for
35 attorneys fees;

1 WHEREAS, additional time is necessary to enable the parties to meet and confer
2 regarding any disputed issues relating to plaintiffs' attorneys fees before making a motion for an
3 award of attorney's fees, as required by Civil Local Rule 54-6;

4 WHEREAS, additional time may allow the parties to resolve any disputed issues relating
5 to attorney's fees, thus obviating the need and expense of a motion for an award of attorney's
6 fees;

7 WHEREAS the court's rulings on post-trial motions is pending;

8 The parties, pursuant to a stipulation, hereby respectfully request that the deadline for a
9 motion by plaintiffs for attorney's fees be extended by ninety days, to and including March 12,
10 2007.

11 Dated: November , 2006

GONZALEZ & LEIGH, LLP

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By: _____ /s/

G. Whitney Leigh

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Attorneys for Plaintiff
DENIZ BOLBOL, JOSEPH CUVIELLLO and
ALFREDO KUBA

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Dated: November 21, 2006

BERLENER & COHEN

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By: _____

Frank R. Ubhaus

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Attorneys for Defendant
SAN JOSE ARENA MANAGEMENT
COMPANY, LLC

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ORDER

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IT IS SO ORDERED.

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Dated: November 28, 2006

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Stipulation and [Proposed] Order Extending
Time for Filing of Motion for Attorney's Fees

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James Ware
The Honorable James Ware
Bolbol, et al. v. The Ringling Bros., et al.
Case No. C-04-00082 JW